

ATTACHMENT A

DEC 11 2018

STIPULATION OF FACTS

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

BY

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

At least in or about January 2018, in the District of Maryland and elsewhere, the Defendant, **GERALD DAWAYNE MARSHALL** (“**MARSHALL**”), did knowingly combine, conspire, confederate, and agree with Co-Defendant **Sean Dean** (“**Dean**”) to recruit, entice, harbor, transport, and maintain at least three females—Girl 1, Girl 2, and Woman 1—knowing that Girl 1 and Girl 2 would be caused to engage in a commercial sex act. **MARSHALL** did so, having had a reasonable opportunity to observe Girl 1 and Girl 2, knowing and in reckless disregard of the fact that Girl 1 and Girl 2 had not attained the age of 18 years.

In or about January 2018, **Dean** recruited Girl 1, Girl 2, and Woman 1 to engage in commercial sex acts under the direction of **Dean**. **MARSHALL** rented rooms at hotels in Timonium, Maryland, and Laurel, Maryland, to be used for the purpose of commercial sex acts by Girl 1, Girl 2, and Woman 1. Girl 1, Girl 2, and Woman 1 were transported by **Dean** and **MARSHALL** to several hotels in Maryland, where **Dean**, **MARSHALL**, Girl 1, Girl 2, and Woman 1 stayed for multiple days at a time. While in the hotel rooms rented by **MARSHALL**, Girl 1, Girl 2, and Woman 1, at **Dean**’s direction, utilized “Backpage.com” to advertise Girl 1, Girl 2, and Woman 1 for commercial sex acts. “Backpage.com” commonly was used by prostitutes and “pimps” for such advertisements. The advertisements posted contained pictures of Girl 1, Girl 2, and Woman 1 in provocative poses and provided contact information to secure a “date” with one or more of the females. Girl 1, Girl 2, and Woman 1 agreed to share a portion of the proceeds from their commercial sex acts with **Dean**.

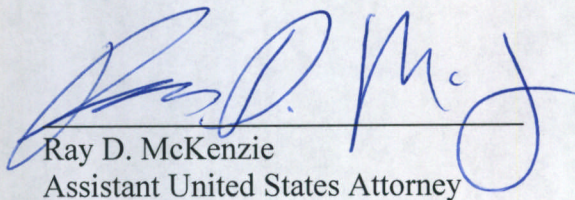
During the first week of January 2018, **Dean** and **MARSHALL** transported Girl 1, Girl 2, and Woman 1 to a hotel in Timonium, Maryland. Advertisements were placed from this hotel. Girl 1, Girl 2, and Woman 1 were at that hotel for approximately one week and met with multiple “johns” per day for the purpose of engaging in commercial sex acts. Girl 1, Girl 2, and Woman 1 shared a portion of the proceeds with **Dean**.

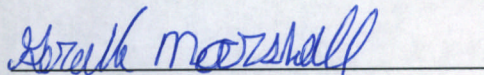
During the second week of January 2018, **Dean** and **MARSHALL** transported Girl 1, Girl 2, and Woman 1 to a hotel in Laurel, Maryland. **Dean**, **MARSHALL**, Girl 1, Girl 2, and Woman 1 stayed at this hotel for one or two days. Girl 1, Girl 2, and Woman 1 engaged in commercial sex acts while at this hotel and shared a portion of the proceeds with **Dean**.

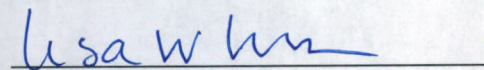
On or about January 11, 2018, **Dean** and **MARSHALL** transported Girl 1, Girl 2, and Woman 1 to a second hotel in Laurel, Maryland. **MARSHALL** went to the front desk and obtained keys to the rooms that were intended for Girl 1, Girl 2, and Woman 1 to use for commercial sex acts. Law enforcement subsequently responded to the hotel due to a complaint about the smell of marijuana coming from two different rooms **MARSHALL** rented. In the two

rooms, law enforcement located Girl 1, Girl 2, and Woman 1, along with condoms and personal lubricant, which was to be used in connection with commercial sex acts.

SO STIPULATED:


Ray D. McKenzie
Assistant United States Attorney


Gerald Dawayne Marshall
Defendant


Lisa Lunt, Esq.
Counsel for Defendant